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RAC The Railway Association of Canada
L'Association des chemins de fer du Canada ACFC

April 7, 2003

Ref.: c.3-17

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

Subject: Opposition to ITA Petition (RM No. 10687)

The Railway Association of Canada ("RAC") hereby registers its opposition to the petition of the Industrial Telecommunications Association ("ITA") to become a certified frequency coordinator for railroad mobile radio channels in the United States.

RAC's members consist of the freight, commuter, tourist and intercity railways of Canada. In addition to representing its members in policy development and advocacy before governmental bodies, RAC serves as the exclusive frequency coordinator for the land mobile radio spectrum allocated and licensed by Industry Canada for use by the Canadian railroads.

Due to extensive near-border and cross-border traffic and operations, the mobile radio systems of railroads in the United States and Canada are essentially interoperable. In this regard, the U.S. and Canadian railroads share a common frequency plan for land mobile radio channels at 160 MHz, 450 MHz and 900 MHz, with RAC and the Association of American Railroads ("AAR") each performing the frequency coordination function for channels used, respectively, in Canada and the United States.

There are two reasons why RAC opposes the proposal of **ITA** to open up the railroad frequency coordination function in the U.S. to multiple coordinators. First, it would unnecessarily complicate and impede the consultative process for near-border and through-service applications. Historically, the frequency coordinators at RAC and **AAR** have engaged in regular and routine consultation with each other on applications of common concern. This close consultative relationship has resulted in timely and efficient coordination decisions and effective resolution of potential conflicts. These benefits are attributable in large measure to the fact that the frequency coordinators at RAC and AAR are knowledgeable about the unique operational requirements of the railroad industry. These benefits would be lost if the RAC were required to deal with a multiplicity of frequency coordinators in the U.S., especially if eligibility were opened up to U.S. frequency coordinators with no knowledge, expertise or experience in railroad operations.

Second, it would inhibit significantly thc ability of Canadiaii and U.S railroads lo accomplish cohesive and orderly migration to narrowband channelization as envisioned by the FCC in its "refarming" decision and by Industry Canada in its comparable proceeding involving rechannelization of the land mobile bands in Canada. This will be a long, gradual migration by railroads on both sides of the border, and will require close and careful frequency coordination for railroad radio users in Canada and the United States, as explained below.

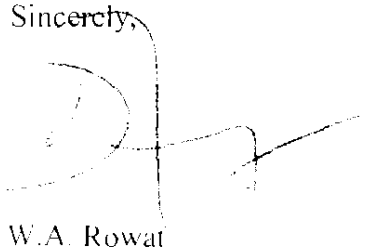
The migration to narrowband (I 2.5 kHz channel width) contemplated by Industry Canada and the FCC envisaged a fairly simple replacement of wideband radios with narrowband units. Although that conversion mcthod may be practical for users having a relatively small number of radio units operating in a limited geographic area, it is not workable for railways, which have a very large radio inventory that must be changed without affecting existing train operations that are supported hy thnc rail industry's nationwide mobile radio networks in Canada and thc U.S. Because the quantity of radio equipment in the rail industry (both base stations and mobile units) is so vast, the conversion necessarily will bc gradual, which means that wideband and narrowband radios will he intermixed during the lengthy period of time required to complete the conversioti.

During the transition, careful frequcncy coordination will be extremely important bccause of the potential interaction of adjaccnt narrowband and wideband radio systems and the consequent risk of destructive intederence *to* ongoing operations. In other words, the common Canadian-U.S. channel plan will require that railroad communications engineers and planners in both countries work closely together in implementing the migration to narrowband.

RAC strongly believes the migration can be successful in both countries only if there is a single point of contact on each side regarding the frequency assignment plan during the transition. In this regard, RAC's Class 1 freight railroad members (Canadian National and Canadiaii Pacific) also are members of AAR, and for some time RAC has been working with AAR on overall frequency planning for the narrowband conversion and niigration, starting in the early 1990s with the joint "North American Railroad Radio Network" ("NARRN") project, and more recently as a participant in AAR's Wireless Communications Task Force ("WCTF"). This relationship has thus far worked very well. But if multiple frequency coordinators were to be inserted into the equation on thc U.S. side of the border, the process of planning and implementing the migration would become unduly complex an unmanageable, and RAC's effectiveness in implementing narrowband conversion in Canada would be seriously jeopardircd.

Thank you lor providing RAC the opportunity to express its views in this proceeding

Sincerely,



W.A. Rowat
President and Chief Executive Officer

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